

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION COMMISSION

RECEIVED 000
2015 APR 30 A 9:01

**IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION FOR THE PURPOSE OF
CONSIDERING:**

**APPLICATION OF LINN OPERATING, INC. TO
AMEND COMMISSION ORDER NO. R-11980-A
REGARDING THE EAST HOBBS SAN ANDRES
UNIT, LEA COUNTY, NEW MEXICO.**

Case No. 15284

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Linn Operating, Inc. as required by the Oil Conservation Commission.

APPEARANCES

APPLICANT

Linn Operating, Inc.
Suite 4900
600 Travis
Houston, Texas 77002

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Debra J. Gordon
Regulatory Compliance Manager
(281) 840-4010
dgordon@linnenergy.com

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Commission Order No. R-11980-A approved the East Hobbs San Andres Unit, a statutory unit, for the purpose of instituting a pressure maintenance project within the East Hobbs-San Andres Pool. The unit covers portions of Sections 29-32, Township 18 South, Range 39 East, NMPM.

Applicant seeks an order amending Order No. R-11980-A to eliminate Ordering Paragraph 9, which required that no fresh water be used as make-up water or otherwise be injected. Applicant intends to institute a carbon dioxide flood in the unit at a future date, but to do so needs to re-pressurize or fill up the reservoir, and the best and possibly only way to do so is to use fresh water from the City of Hobbs water system.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Robert B. Sullivan (engineer)	30 min.	Approx. 4

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
------------------	------------------	-----------------

PROCEDURAL MATTERS

-None-

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Linn Operating, Inc.